

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)

(richard.slack@weil.com)

Jessica Liou (*pro hac vice*)

(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)

(matthew.goren@weil.com)

767 Fifth Avenue

New York, NY 10153-0119

Tel: 212 310 8000

Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)

(tkeller@kbbkllp.com)

Peter J. Benvenuti (#60566)

(pbenvenuti@kbbkllp.com)

Jane Kim (#298192)

(jkim@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: 415 496 6723

Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF EDWARD J.
RADETICH, JR. IN SUPPORT OF
REORGANIZED DEBTORS' SIXTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (SECURITIES ACQUIRED
OUTSIDE SUBJECT PERIOD)**

Response Deadline:

June 29, 2021, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: July 13, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Edward J. Radetich, Jr., pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a Managing Director of Kroll Settlement Administration LLC (“KSA”), an affiliate
5 of Prime Clerk LLC (“Prime Clerk”). KSA’s main office is located in Philadelphia, Pennsylvania.

6 2. I am providing this Declaration in support of the *Reorganized Debtors’ Sixth Securities*
7 *Claims Omnibus Objection (Securities Acquired Outside Subject Period)* (the “**Omnibus Objection**”),¹
8 filed contemporaneously herewith in the chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E
9 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the
10 “**Debtors**” or the “**Reorganized Debtors**,” as applicable).

11 3. I have extensive experience and expertise in all aspects of claims administration, including
12 direct notice, paper and electronic publication, nominee outreach, website design, claimant communication,
13 claims intake and processing, distribution of payments, and tax reporting. Notably, I personally oversaw the
14 very first securities class action, the Atlantic Department Stores class action lawsuit in 1975. Since then, our
15 team has administered more than 3,000 matters involving securities fraud, antitrust, consumer, employment
16 and labor, and government enforcement actions. Our team has handled all aspects of claims administration
17 in many noteworthy securities class action settlements in recent years, including *In re Bank of America*
18 *Corporation Securities Litigation*, No. 11-CV-00733-WHP (S.D.N.Y); *In re Longwei Petroleum Investment*
19 *Holding Limited Securities Litigation*, No. 13 Civ. 214 (RMB) (S.D.N.Y); and *In re The Bank of New York*
20 *Mellon ADR FX Litigation*, No. 1:16-cv-00212 (S.D.N.Y). A detailed description of my experience and
21 qualifications is attached as **Exhibit A**.

22 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
23 my personal knowledge, the knowledge of other employees working under and alongside me on this
24 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various
25

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the
27 Omnibus Objection.
28

1 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
2 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
3 Declaration on behalf of the Reorganized Debtors.

4 **Identification of Claims Subject to the Omnibus Objection**

5 5. Prime Clerk has been asked by the Reorganized Debtors and their counsel to assist with
6 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the
7 Chapter 11 Cases and identifying claims to be included in the Omnibus Objection. In furtherance
8 thereof, our team has reviewed and established a database for these claims. The database contains
9 information extracted from proofs of claim and submitted by claimants via an online portal, including,
10 where such details were provided by the claimant, information regarding when such claimant purports
11 to have acquired their position(s) in the Debtors' debt and equity securities that form the basis of the
12 claim.

13 6. Based on our review, we have identified certain claims based on the purchase or
14 acquisition of PG&E securities where the holder of the claim did not report any transactions for the
15 purchase or acquisition of the Debtors' securities during the period from April 29, 2015 through
16 November 15, 2018 inclusive.

17 7. Specifically, utilizing our proprietary software, we identified claims based on the
18 purchase or acquisition of PG&E securities that were filed after the Initial Bar Date and did not reflect a
19 purchase or acquisition between the dates of April 29, 2015 to November 15, 2018. These identified
20 Claims are set forth on **Exhibit 1** to the Omnibus Objection, which was prepared by our team under my
21 general supervision, and I am familiar with its contents and the process under which it was prepared.

22
23
24 [REMAINDER OF PAGE LEFT BLANK INTENTIONALLY]
25
26
27
28

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief.

3
4 Executed June 1, 2021 in New Jersey.

5
6 /s/ Edward J. Radetich, Jr.

7 Edward J. Radetich, Jr.

8 Managing Director
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28